

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

In Re Ethicon, Inc., Pelvic Repair
System Products Liability Litigation

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MDL No. 2327

THIS DOCUMENT RELATES TO:
Pretrial Orders No. 4, 6, 34 and 69

**SECOND OMNIBUS MOTION BY PLAINTIFFS TO AMEND THE MEMBERSHIP OF
THE PLAINTIFFS' STEERING COMMITTEE**

The Plaintiffs, by and through Plaintiffs' Co-Liaison Counsel, Harry F. Bell, Jr. and The Bell Law Firm, PLLC, submits this *Plaintiffs' Motion to Amend the Membership of the Plaintiffs' Steering Committee* as set forth in the Pretrial Orders identified in the case-style herein, as follows:

I. RESIGNATIONS

It has been brought to the attention of the Leadership of the *Ethicon, Inc. Pelvic Repair System Products Liability Litigation MDL No. 2327* listed above, of the Executive Committee, and of the Court, that there are several members of the Plaintiffs' Steering Committee whom have decided to resign for various reasons as set forth in their respective letters attached hereto.

WHEREFORE, Plaintiffs respectfully move this Court to enter an Order removing said members from the Plaintiffs' Steering Committee. Those members are identified, and their resignation letters attached, as follows:

- John Restaino, Esquire – The Restaino Law Firm (**Exhibit A**)

II. NEW APPOINTMENTS

It has also been brought to the attention of the Leadership of the listed above, of the *Ethicon, Inc. Pelvic Repair System Products Liability Litigation MDL No. 2327* Executive Committee, and of the Court, that counselors have reached out requesting placement in the Plaintiffs' Steering Committee, as set forth in their respective letters attached hereto, and in their applications for appointment submitted to the Court.

WHEREFORE, Plaintiffs respectfully move this Court to enter an Order placing said counsel on the Plaintiffs' Steering Committee. Those new members are identified, and their letters requesting addition to the Plaintiffs' Steering Committee are attached, as follows:

Willard J. Moody, Jr. Esquire (**Exhibit B, C, D, E**)
The Moody Law Firm, PLLC
500 Crawford St. Ste. 200
P.O. Box 1138
Portsmouth, VA 23705
(757) 393-4093 (Office)
(757) 397-7257 (Facsimile)
will@moodyrllaw.com

Archibald Cleveland Lamb, Esquire (**Exhibit F, G**)
The Lamb Firm, L.L.C.
2900 1st Avenue South
Birmingham, AL 35233
(205) 324-4644 (Phone)
(205) 324-4649 (Fax)
Alamb@ArchieLamb.com

Russell Budd, Esquire (**Exhibit H, I, J**)
Baron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219
(214) 521-3605 (Phone)
(214) 520-1181 (Fax)
rbudd@baronbudd.com

WHEREFORE, Plaintiffs respectfully move this Court to enter an Order removing John Restaino from the Plaintiffs' Steering Committee and placing Willard J. Moody, Jr., Archibald Cleveland Lamb and Russell Budd on the Plaintiffs' Steering Committee.

Respectfully submitted,

/s/Harry F. Bell, Jr. (WVSB # 297)

Harry F. Bell, Jr., Esquire (WVSB # 297)

THE BELL LAW FIRM, PLLC

30 Capitol Street

P.O. Box 1723

Charleston, WV 25326-1723

(304) 345-1700

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Plaintiffs' Executive Committee

Plaintiffs' Co-Liaison Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of January, 2014, I electronically filed the foregoing Document with the Clerk using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these MDLs.

/s/Harry F. Bell, Jr. (WVSB # 297)
Harry F. Bell, Jr., Esquire (WVSB # 297)
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Plaintiffs' Executive Committee
Plaintiffs' Co-Liaison Counsel